

### **REMARKS/ARGUMENTS**

Claims 12-22 are currently pending in the present application. In the Office Action dated February 9, 2006, Claims 12, 13, 15-18, 20, and 22 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,911,121 to Andrews ("Andrews"). Claim 19 was rejected under 35 U.S.C. § 103(a) as being obvious over Andrews. Claims 14 and 21 were objected to as being dependent upon a rejected base claim, but would otherwise be allowable if rewritten in independent form. In view of the following remarks, Applicants respectfully request reconsideration and allowance of all of the pending claims of the present application.

#### **1. Summary of the Andrews Reference**

The Andrews reference describes a mobile telephone **10** where there are a variety of telephone models, each model possessing different features or functions. To simplify the manufacture of the variety of different models, the telephone housing comprises a front cover **44** and a back cover **42**, wherein the back cover **42** of the telephone **10** has a common printed circuit board **46** containing the circuitry and programming for all of the different models of the telephone **10**. The printed circuit board **46** contains a program memory **14** which includes a plurality of program configurations which correspond to each of the available telephone models. Each telephone model has a corresponding front cover **44** of the telephone housing.

#### **2. Andrews does not teach or suggest a user exchangeable cover part having electrical circuitry for supporting the user interface of the wireless terminal, as recited by independent Claims 12, 15, and 22.**

Although the Andrews patent does describe that the front cover of the mobile telephone contains a keyboard and a display, the Andrews patent specifically states that "the printed circuit board **46** [which is not part of the front cover] contains all of the circuitry needed for each of the various phone models." *See* col. 3, lines 28-30; and col. 5, lines 13-15 (emphasis added). The Andrews patent provides an example where different phone models have different keypads **18**. In such a case, "the printed circuit board **46** must be designed to

include circuitry for each different keypad 18.” See col. 5, lines 15-18. Andrews further states that “if different models use different displays, then the printed circuit board 46 needs to include circuitry for driving each display 20.” See col. 5, lines 18-20.

Andrews describes in detail an example of how the printed circuit board can be designed to be used with two phone models having different keypads. In this regard, Andrews states that:

FIG. 10 shows a plan view of a printed circuit board 46 which may be used with either one of the front covers 42 shown in FIGS. 6 and 8. The printed circuit board 46 includes a plurality of key contacts 48. The key contacts 48 are arranged to work with either the six-function keypad shown in FIG. [8] or the five-function keypad shown in FIG. 6.

See col. 6, lines 47-53. FIG. 10 shows how the printed circuit board includes key contacts that line up with each of the keys that may exist on the front cover of the phone depending on the type of front cover used. It appears from this configuration that when a key on the keypad is pressed, it contacts the key contacts 48 on the printed circuit board. Thus, the keypad of Andrews does not contain electrical circuitry in the removable cover, consistent with the statements in Andrews claiming that all of the electrical circuitry for the various phone models is included on the printed circuit board.

Therefore, the Andrews patent does not teach or suggest a user exchangeable cover part having electrical circuitry for supporting the user interface of the wireless terminal, as recited by the independent claims of the present invention. Instead, as described above, Andrews specifically teaches the opposite: that all of the circuitry for various phone models must be included on the main circuit board of the phone. In fact, Andrews does not describe any electrical circuitry on the front cover, other than the program selector 60 used to identify the type of front cover. For at least the reasons described above, independent Claims 12, 15, and 22, as well as the claims that depend therefrom, are patentably distinct over Andrews and, therefore, should be in condition for allowance.

3. Andrews does not teach or suggest a connector pin as claimed by dependent Claims 13 and 20.

Furthermore, with respect to dependent Claims 13 and 20, Andrews does not teach or suggest a connector pin that is used to: (1) sense a resistor value included in an identification means and, afterwards, (2) operate the electrical circuitry of the user exchangeable cover part, as recited by dependent Claims 13 and 20. The Office Action cites the jumper pins **64** of the program selector **60**, of Andrews, as anticipating Claims 12 and 20. While Andrews does describe the jumper pins **64** as being used to identify the type of removable cover, Andrews does not describe using any of these same pins to operate electrical circuitry of the user exchangeable cover part. In fact, as described above with respect to the independent claims, Andrews does not teach or suggest an exchangeable cover having any electrical circuitry for supporting the user interface of the wireless terminal. Therefore, it is not surprising that Andrews also does not teach or suggest any pins or connectors that are used to operate electrical circuitry in the exchangeable cover, wherein the electrical circuitry supports the user interface of the wireless terminal. For this additional reason, dependent Claims 13 and 20 are patentable over Andrews.

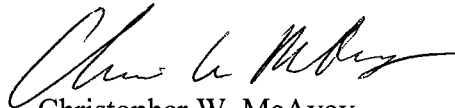
Appl. No.: 10/085,010  
Amdt. dated 04/03/2006  
Reply to Office action of February 9, 2006

**Conclusion**

In view of the remarks presented above, it is respectfully submitted that the claims of the present application are in condition for allowance. It is respectfully requested that a Notice of Allowance be issued in due course. The Examiner is requested to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,



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